

**ORIGINAL**

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., : :

Plaintiffs, : :

v. : Civil action No. 05-823 (KAJ)

STANLEY TAYLOR, et al., : :

Defendants : :

REQUEST FOR PRODUCTION OF DOCUMENTS

TO: STANLEY TAYLOR, et al.



PLEASE TAKE NOTICE that the Plaintiffs, pursuant to the Federal Rule Civil Procedure Rule 26(a) request that the Defendants, produce for inspection, copying, or photographing the following documents:

1. All documents, incident reports and/or work orders regarding complaints of high temperatures and high heat at the Sussex Correctional Institution (SCI), Kitchen Unit since the year of 1997.
2. All written memoranda or correspondence between the Department of Corrections' (DOC) food service employees at SCI regarding the conditions which forms the subject matter of the Complaint.
3. Produce the Delaware Correctional Association Contractual Agreement, the article or section in regards to maintaining a safe work environment.
4. Any and all written policies and/or procedures concerning the responsibility of the Defendants and representatives' of the Defendants to initiate and maintain such programs as may be necessary to maintain a safe work environment at the SCI kitchen.
5. All transcripts of interview by any correctional personnel regarding the alleged bad condition which is the subject of this lawsuit.

Any logs, books, documents, tapes, or other tangible evidence of communication between representatives of the Defendants and the Defendants concerning the alleged bad condition at SCI main kitchen Unit.

6. Produce any training manual or training programs that instruct DOC food service employees in the recognition and avoidance of unsafe conditions and the regulations applicable to their work environment to control or eliminate any hazards or other exposure to illness or injury.

7. Produce all SCI main kitchen log books since 1996, and any other documents which maintain recorded temperature at the SCI main kitchen.

July 10, 2006

George A. Jackson  
Damsg  
B. Sander

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

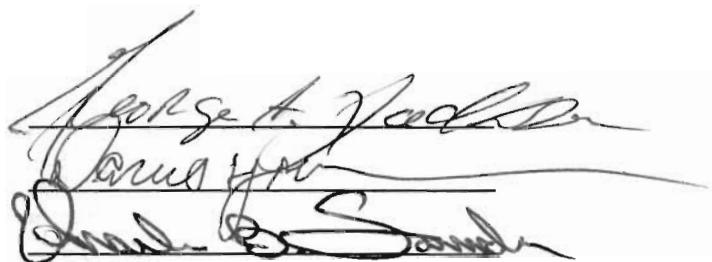
GEORGE A. JACKSON, et al )  
Plaintiffs, )  
v. )  
STANLEY TAYLOR, et al., ) CIVIL ACTION NO. 05-823 (KAJ)  
Defendants. )

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2006 Plaintiffs forward PRODUCTION OF DOCUMENTS to Defendants. Plaintiffs hereby certify that on July 30, 2006 Plaintiffs have mailed by United States Postal Services, the said document to the following:

State of Delaware  
Department of Justice  
820 N. French Street, 6th Floor  
Wilmington, DE 19947

Attorneys for Defendants



A handwritten signature in black ink, appearing to read "George A. Jackson". Below it is another signature, possibly "James J. Smith", and at the bottom, a stylized signature that might be "Stanley Taylor".